

G. Michael Gruber

State Bar. No. 08555400

gruber.mike@dorsey.com

H. Joseph Acosta

State Bar No. 24006731

acosta.joseph@dorsey.com

Brian E. Mason

State Bar No. 24079906

mason.brian@dorsey.com

DORSEY & WHITNEY LLP

300 Crescent Court, Suite 400

Dallas, TX 75201

Tel.: (214) 981-9900

Fax: (214) 981-9901

Attorneys for Ackerman McQueen, Inc.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CHAPTER 11
	§	
NATIONAL RIFLE ASSOCIATION OF AMERICA and SEA GIRT LLC,	§	Case No. 21-30085-sgj-11
	§	
DEBTORS.	§	JOINTLY ADMINISTERED

**NOTICE OF HEARING ON ACKERMAN MCQUEEN, INC.'S MOTION TO DISMISS
CHAPTER 11 BANKRUPTCY PETITION, OR, IN THE ALTERNATIVE,
MOTION FOR THE APPOINTMENT OF A CHAPTER 11 TRUSTEE**

PLEASE TAKE NOTICE THAT the hearing(s) on the *Motion to Dismiss Chapter 11 Bankruptcy Petition, or, in the Alternative, Motion for the Appointment of a Chapter 11 Trustee* (the “*Dismissal Motion*”) [Dkt. No. 131] are scheduled to commence on **March 29, 2021, at 10:30 a.m. CST**, and continue (as necessary) on **March 30, 2021, starting at 9:00 a.m. CST**, and **March 31, 2021, starting at 10:30 a.m.** (collectively, the “**Hearings**”), before the Honorable Harlin D. Hale, United States Bankruptcy Judge for the Northern District of Texas.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Rule of Bankruptcy Procedure 9014(c):

NO HEARING WILL BE CONDUCTED ON THE DISMISSAL MOTION UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT EARLE CABELL FEDERAL BUILDING, 1100 COMMERCE STREET, RM. 1254, DALLAS, TEXAS 75242-1496 BEFORE CLOSE OF BUSINESS ON MARCH 5, 2021, WHICH IS AT LEAST 21 DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK, AND A COPY SHALL BE SERVED UPON COUNSEL FOR THE MOVING PARTY (ACKERMAN MCQUEEN, INC.) PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING MAY BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.

IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

PLEASE TAKE FURTHER NOTICE the Hearings will be conducted via Webex.

Parties are requested to review the Webex information/tips posted on Judge Hale's webpage prior to the hearing. The Webex hearing link and Webex information/tips may be accessed here: <https://www.txnb.uscourts.gov/judges-info/hearing-dates/judge-hales-hearing-dates>.

PLEASE TAKE FURTHER NOTICE that additional information regarding how to participate in a Webex hearing is attached hereto.

If you would like a copy of the Dismissal Motion, please contact the undersigned counsel.

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Date: February 12, 2021

Respectfully submitted,

DORSEY & WHITNEY LLP

By: /s/ H. Joseph Acosta

G. MICHAEL GRUBER

State Bar No. 08555400

gruber.mike@dorsey.com

H. JOSEPH ACOSTA

State Bar No. 24006731

acosta.joseph@dorsey.com

BRIAN E. MASON

Texas Bar No. 24079906

mason.brian@dorsey.com

300 Crescent Court, Suite 400

Dallas, Texas 75201

Phone: (214) 981.9900

Facsimile: (214) 981.9901

**ATTORNEYS FOR ACKERMAN MCQUEEN,
INC.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served upon all parties named on the attached Master Service List by first-class U.S. Mail, and all parties receiving notice by and through the Court's CM/ECF system on February 12, 2021

/s/ H. Joseph Acosta

H. JOSEPH ACOSTA

In re: Sea Girt LLC - Case No. 21-30080

In re: National Rifle Association of America - Case No. 21-30085

MASTER SERVICE LIST

Debtor/Debtor's Counsel

National Rifle Association of America
11250 Waples Mill Road
Fairfax, VA 22030

Neligan LLP
Attn: Patrick J. Neligan
Douglas J. Buncher
John D. Gaither
325 N. St. Paul, Suite 3600
Dallas, TX 75201
Email: pneligan@neliganlaw.com
dbuncher@neliganlaw.com
jgaither@neliganlaw.com

Sea Girt LLC
11250 Waples Mall Road
Fairfax, VA 22030

U.S. Trustee

Office of the United States Trustee
Attn: Lisa Young
Earle Cabell Federal Building
1100 Commerce Street, Room 976
Dallas, TX 75242

Secured Creditors

Atlantic Union Bank
Attn: Andrew Kalin
1800 Robert Fulton Drive, Suite 100
Reston, VA 20191
Email: andrew.kalin@atlanticunionbank.com

20 Largest Unsecured Creditors

Ackerman McQueen, Inc.
1601 Northwest Expressway
Oklahoma City, OK 73118-1438

Membership Marketing Partners LLC
11250 Waples Mill Road, Suite 310
Fairfax, VA 22030

Gould Paper Corporation
Attn: Warren Connor
99 Park Avenue, 10th Floor
New York, NY 10016

Infocision Management Corp.
325 Springside Drive
Akron, OH 44333

Under Wild Skies
201 N. Union Street, Suite 510
Alexandria, VA 22314

Valtim Incorporated
P.O. Box 114
Forest, VA 24551

Quadgraphics
N63W23075 Hwy. 74
Sussex, WI 53089

Communications Corp of America
Attn: Judy Reid
13195 Freedom Way
Boston, VA 22713

Membership Advisors Public REL
11250 Waples Mill Road, Suite 310
Fairfax, VA 22030

Salesforce.Com, Inc.
One Mark St. – The Landmark, Suite 300
San Francisco, CA 94105

Mercury Group
1601 NW Expressway, Suite 1100
Oklahoma City, OK 73118

Speedway Motorsports, Inc.
P.O. Box 600
Concord, NC 28026

Image Direct Group LLC
200 Monroe Avenue, Building 4
Frederick, MD 21701

Google
1600 Amphitheatre Parkway
Mountain View, CA 94043-1351

TMA Direct, Inc.
12021 Sunset Hills Road, Suite 350
Manassas, VA 20109

United Parcel Services
P.O. Box 7247-0244
Philadelphia, PA 19170

Membership Advisors Fund Raising
11250 Waples Mill Road, Suite 310
Fairfax, VA 22030

Stone River Gear, LLC
P.O. Box 67
Bethel, CT 06801

Krueger Associates, Inc.
105 Commerce Drive
Aston, PA 19014

CDW Computer Centers, Inc.
P.O. Box 75723
Chicago, IL 60675

Government Agencies

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

Office of Attorney General (NY)
Attn: Letitia James
28 Liberty Street
New York, NY 10005

Office of Attorney General (DC)
Attn: Karl A. Racine
441 Fourth St., N.W., Suite 600-South
Washington, DC 20001

Office of Attorney General (TX)
Attn: Ken Paxton
P.O. Box 12548
Austin, TX 78711-2548

Mahmooth A. Faheem
Lori A. Butler
Pension Benefit Guaranty Corporation
1200 K NW
Washington, DC 20005-4026
mahmooth.faheem@pbgc.gov
butler.lori@pbgc.gov
efile@pbgc.gov

Notice of Appearance

Laurie A. Spindler
Linebarger Coggan Blair & Sampson, LLP
2777 N. Stemmons Freeway, Suite 1000
Dallas, TX 75207
dallas.bankruptcy@publicans.com

G. Michael Gruber
Dorsey & Whitney LLP
300 Crescent Court, Suite 400
Dallas, TX 75201
gruber.mike@dorsey.com

Brian E. Mason
Dorsey & Whitney LLP
300 Crescent Court, Suite 400
Dallas, TX 75201
mason.brian@dorsey.com

H. Joseph Acosta
Dorsey & Whitney LLP
300 Crescent Court, Suite 400
Dallas, TX 75201
acosta.joseph@dorsey.com

Natalie L. Arbaugh
Winston & Strawn LLP
2121 N. Pearl Street, Suite 900
Dallas, TX 75201
narbaugh@winston.com

Thomas M. Buchanan
Matthew Saxon
Winston & Strawn LLP
1901 L St., N.W.
Washington, DC 20036
tbuchana@winston.com
msaxon@winston.com

David Neier
Winston & Strawn LLP
200 Park Avenue
New York, NY 10166-4193
dneier@winston.com

Tara LeDay
McCreary, Veselka, Bragg & Allen, P.C.
P.O. Box 1269
Round Rock, TX 78680
tleday@mvalaw.com

Michael I. Baird
Pension Benefit Guaranty Corporation
1200 K St. NW
Washington, DC 20005-4026
baird.michael@pbgc.gov
efile@pbgc.gov

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
OFFICE OF THE CLERK**



October 9, 2020

CLERK'S NOTICE 20-04

PARTICIPATING IN BANKRUPTCY COURT HEARINGS BY VIDEOCONFERENCE

During the COVID-19 Pandemic, the Northern District of Texas Bankruptcy Court is conducting most of its hearings virtually, using WebEx video conferencing. There is no fee/charge of any kind for the participants, although you will have to download the WebEx application to your electronic device. The WebEx meeting link, meeting number, and access code will be posted on the judge's webpage and/or on the ECF docket for the case. Please review the information below **prior to** participating in a hearing via WebEx.

CONNECTION INSTRUCTIONS FOR PARTICIPATING IN A WEBEX VIRTUAL HEARING

The court will allow participation in a virtual hearing using either of the following two methods. Please connect at least 10 minutes prior to the hearing time. It is recommended that attorneys discuss the logistics of the WebEx appearance with their clients/witnesses at least 48 hours before the hearing.

Option 1: Using the WebEx app on your smartphone, tablet, laptop, or desktop.

It is strongly preferred that participants who may speak during a hearing use the WebEx application rather than using the "call-in" option described in Option 2.

Attorneys and/or witnesses who anticipate offering extensive testimony or legal argument or conducting examination are required to utilize the video function. The court may consider special requests for other appearance options on a case by case basis.

Please connect using only one device. Using two or more devices may cause audio feedback issues.

If using a phone or tablet for video, it should be set in a stationary position. Holding a phone or tablet in your hand while speaking does not yield a good video for the court.

NOTE: If you are experiencing audio issues when using the WebEx application, you may use the "Call Me At" selection under "Audio Connection" to move just the audio portion of the WebEx conference to your telephone.

Option 2: Call-in via phone (audio only).

The meeting number/access code changes with each meeting and will be made available, along with the dial-in number on the WebEx link and instructions sheet found on the judge's webpage and/or on the ECF docket for the case.

HELPFUL HINTS AND ETIQUETTE

- Please use the mute function when you are not speaking. Please be aware that sometimes the court mutes everyone when there is background noise. When you want to speak, make sure you are not on mute. Call-in users should dial *6 to unmute your line.
- Remember to state your name for the record each time before speaking and speak slowly and clearly so the court can get a good record.
- Use headphones whenever possible, especially if using a desktop PC with external speakers. We have found that newer iPhones provide the best visual and audio feed – better than most desktop computers. If you are on a personal computer, headphones or earbuds are required for those who need to speak during the hearing.
- During examination, attorneys and witnesses should use a separate camera and microphone when possible. To avoid feedback, parties using separate devices must not be in the same room. The court may consider special requests on a case by case basis.
- WebEx participants may use the "share" button to easily share their screen or document with the court or other WebEx participants. Press “stop sharing” to remove the presentation from the meeting.
- When making an appearance from a vehicle, please park in a safe location with windows rolled up (to minimize background distraction and noise) and use a headset that is ear-to-phone (not the vehicle’s hands-free speaker-phone option).
- Suggestions for participating in a WebEx hearing from home: If you are having connectivity problems, turn off devices that may be using bandwidth on your home network. Devices or applications such as Facetime, Roku, streaming media players, video games, or large downloads can negatively impact the audio and video quality of the WebEx meeting.
- Participants are reminded that they should wear attire suitable for court.
- Participants who wish to test their WebEx connection or the share screen functionality in advance of the hearing may arrange a “practice run” by contacting the courtroom deputy.

EXHIBITS AND DEMONSTRATIVE AIDS

Exhibits should be filed ahead of time by the date that they would normally be exchanged pursuant to our local rules using the "notice" or "list (witness/exhibit/generic)" event in ECF. For voluminous exhibits, please contact the courtroom deputy, as it may be necessary for you to provide the court with an exhibit notebook or zip file in advance of the hearing.

Demonstrative aids and Power Points should also be filed prior to the hearing, if possible. If not, WebEx has the ability to allow you to share your screen, or a particular document, with everyone in the hearing. If these documents are admitted as exhibits, they would then have to be filed after the hearing.

During the hearing, lawyers can refer to (and offer) their exhibits by referencing the exhibit’s docket number for the court and all to access. After the hearing, the court will create a Minute Entry reflecting which exhibits were admitted. You should consider emailing exhibits to witnesses ahead of time since they may not have access to PACER.